In the office action mailed on September 16, 2004, the examiner asserts that Hatta teaches a slider 69 "for offsetting the display time." Though it is not exactly clear what the examiner meant by "offsetting the display time," it is clear that Hatta's slider 69 is not a user interface control for adjusting a time offset *between two or more video windows*, as taught in the application under examination (the "Application"). It is clear from Hatta's description that slider 69 is a garden-variety user interface control for selecting the point of playback *within a single video window* (7:27-35, 13:10-15, Fig. 5). Moving slider 69 simply adjusts from which frame playback progresses within a specific video window (material card 63). User interface controls similar to Hatta's slider 69 are well known in the art in products such as Microsoft's Windows Media Player, Apple's QuickTime Player, and many other digital imaging applications.

The user interface disclosed and claimed in the Application differs appreciably from slider 69 in Hatta, however. Rather than selecting an absolute playback point within a particular video window, the user interface disclosed in the Application adjusts a time offset (time differential Δt 215) *between two or more video windows* (p. 15 of the Specification, Fig. 13). Slider 69 in Hatta affects only the particular material card 63 (video clip) with which it is associated. It does *not* offset playback of a video sequence between two or more video windows. This is evident from Fig. 5 in Hatta because slider 69 is replicated in each individual material card 63. In stark contrast, the user interface claimed in the Application affects a plurality of video windows by specifying a time offset between them, and only one instance of a user interface control such as sliding control 1400 in Fig. 13 is needed for an entire set of video windows 300 (i.e., such a control is not replicated for each video window). Furthermore, Slider 69 in Hatta is adjusted along a continuum that has units of *absolute* time (the beginning of a video clip to duration 66) (11:49-56), whereas the user interface disclosed and claimed in the Application has units of *differential* time (zero to a maximum time offset or delay). Since Hatta's slider 69 does not disclose the user interface for adjusting time differential Δt 215 that is disclosed and claimed in the Application, the examiner has failed to show that Posa et al. and Hatta, in combination, disclose all of the claim limitations of independent claims 42, 57, and 63, as required for a *prima facie* obviousness rejection.

Regarding claim 53, this claim is directed to selecting a particular video window from among two or more time-offset video windows 300 and being able to hear the audio associated with the selected video window. In addition, when a user reselects a previously selected video window, playback automatically resumes in the reselected video window from the point at which the user left off, and playback of the other time-offset video windows is automatically adjusted accordingly to maintain the same time-offset relationship. Most importantly, all of this takes place in a context in which a set of synchronized, time-offset video windows 300 play back the same video sequence at the same time. The examiner asserts that the user interface controls such as pause button 68 and slider 69 in Hatta, when combined with the teachings of Posa et al., render claim 53 obvious. That assertion is not supported by a close examination of what Hatta really teaches. Claim 53 requires coordination among a plurality of time-offset video windows 300 (e.g., the time index where the user left off in a first video window must be saved so that playback may be resumed from that point automatically when the user reselects the first video window after having selected a second video window). The user interface controls in Hatta do not coordinate the behavior of a plurality of synchronized, time-offset video windows, as recited in claim 53. In fact, material cards 63 in Hatta are independent video sources ("material files") that do not even necessarily display their associated video clips simultaneously (1:57-61, 2:60-67). The user interface controls such as pause button 68 and slider 69 in Hatta, as explained above, affect only the specific material card 63 in which they reside, and all they teach is being able to pause or adjust the playback point of a particular video clip *in a particular video window*, capabilities that are present in virtually every video application. Moreover, Hatta does not teach being able to resume playback in a previously selected video window at a previously saved time index by simply reselecting that previously selected video window, which is an important limitation recited in claim 53. What Hatta does teach is a video editing system in which portions of multiple independent video sources (the individual material cards 63) may be assembled together to form a composite, edited video sequence (1:52-67, 2:1-13). There is nothing taught or suggested in Hatta that, when combined with Posa et al., renders claim 53 obvious.

Since independent claims 42, 53, 57, and 63 are believed to be allowable, all of the remaining claims, which depend from these claims, are also believed to be allowable.

This application is considered to be in condition for allowance, and reconsideration of the application is requested.

Respectfully submitted,

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